

**#58-1** California State Parks (CSP) recognizes that the commenter's client is a stakeholder with a unique perspective and information to offer during the planning process for ABDSP. CSP staff has met with her on several occasions to seek out her opinions on the management of cultural resources in the park. She was hired during the Resource Inventory to provide information on her family and Kwaaymii cultural traditions.

**#58-2** CSP respectfully disagrees. Please note Guidelines Recreation 2a and 2g. Please also see Responses # 13-2 and 13-3. Additionally, CSP has received many letters from the public indicating a desire to keep recreational uses open at ABDSP. Please also note the last paragraph in Section P.1.5.

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Anza Borrego Desert State Park General Plan  
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**By Certified Mail & Fax 619.220.5400**

September 13, 2004

**Re: Comments on Anza-Borrego Desert State Park Preliminary General Plan/EIR,  
Responses to Comments and Revisions to Plan**

Dear Coordinator:

58-1 This letter is sent on behalf of my client, Ms. Carmen Lucas, Kwaaymii Laguna Band of Mission Indians. As you know, Ms. Lucas' ancestors have lived in the Laguna Mountains and the nearby desert since time immemorial. Ms. Lucas attended the General Plan public meeting on April 18, 2002 in Borrego, my office attended the April 30, 2002 meeting in Mission Valley and we both attended the focus group meeting at the San Diego Natural History Museum. We also submitted letters of concern on the planning process dated March 3, 2003, January 17, 2003, May 20, 2002 and October 3, 2001. The attached August 8 and 31, 2004 letters from Ms. Lucas are also in reply to the Plan/EIR, responses to comment and revisions to the plan.

58-2 While we appreciate the work of your office towards creating a long-awaited and much-needed General Management Plan for the Park, and applaud much of the direction in it, we feel compelled to again raise our serious, continued concerns over the treatment of cultural resources in the Responses to Comments and Revised Plan as subordinate to intensive recreational uses (compare, for example, responses to comment (RTC) 22 to 24 showing an ultimate preference for continuing open recreation activities even at the expense of known sensitive cultural resources). We also note that very few substantive changes have been made to the Final Plan text despite the many comments received from us and other entities.

**I. Suggested Revisions to Proposed Changes to the Preliminary General Plan/EIR**

The following are suggested revisions to Proposed Changes to the Plan:

**#58-3** Section 2.2.1.4 identifies the Salton Sea Air Basin as a non-attainment area for PM10. Particulate matter is the primary air pollutant in Imperial County. As stated in Section 2.2.1.4, ABDSP often has good air quality and is not necessarily representative of the two air basins the Park transcends.

**#58-4** Section 3.2.4.5 will be changed to read "... no wildlife, vegetation or cultural resources are impacted...."

**#58-5** This statement is intended to mean "prior to resuming work". It has been included in the event that previously unidentified paleontological resources are discovered during excavation.

**#58-6** Mitigation CR 1 will be changed to read "...controlled and redirected to allow resource recordation, recovery and/or protection prior to resuming construction."

**#58-7** A copy of a Sacred Lands File Records Search conducted by the Native American Heritage Commission (dated 4/16/03) is on file at State Parks. We have mailed a copy of this document to your client. CSP welcomes input from the commenter's client, regrets that not all requested meetings were granted, and will continue to request her participation in future planning efforts. Please see Response # 58-1.

**#58-8** Letters that discuss the General Plan process and where each group could obtain more information were mailed to all tribal groups on the list provided by the Native American Heritage Commission. Other local Native Americans who were not specifically listed by the Native American Heritage Commission were also sent the same letter. All of the Native American groups were also placed on the ABDSP General Plan mailing list. As a result, each tribal office received notices of all public meetings, the Notice Of Availability for the General Plan, and information on how to obtain the Preliminary General Plan and Draft EIR.

**#58-9** The Lucky 5 area is included in the General Plan (see section 3.3.2.4). CSP is cognizant of you client's correspondence and her opinions on a variety of General Plan issues. She has worked closely with State Parks cultural specialists on issues related to land-use planning in the park on many occasions. The recommendations she made will be used to help formulate State Parks staff recommendations concerning protection and interpretation of archaeological sites and other cultural properties. CSP will continue to work with your client. Please see Response # 58-1. Lucky 5 is included in the General Plan process for area-specific planning with unique goals and guidelines. At the time of the previous circulation, for which the referenced responses are appropriate, a separate MND for the Lucky 5 property had been circulated as a capital outlay project that would be implemented under the General Plan. Since that time, many issues have changed including the state funding for the campground at Lucky 5, the Cedar Fire that exposed additional cultural sites, and the decision for placing an equestrian campground on the site. An alternative site located off the property may be selected for a new equestrian campground. Your client has been actively involved in the planning for the Lucky 5 property and its eventual public use.

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- 58-3
- Section 2.2.1.4. Air Quality and Pollutants: Should the proposed change be made in light of EPA's recent reclassification of Imperial County's air quality to serious?
  - Section 2.4.3. Cultural Resource Issues: See attached August 31, 2004 Lucas letter.
- 58-4
- Section 3.2.4.5. Wilderness Zone, Camping: Please change to "Cars may pull off these roads one-vehicle width, as long as no wildlife, ~~or~~ vegetation or cultural resources ~~is~~ are impacted, damaged or destroyed."
- 58-5
- Section 4.5.3.4. Mitigation PR 1: Is there a word missing between protection and development?
- 58-6
- Sections 4.5.3.5. Mitigation CR 1: Is there a word missing between protection and development?

## **II. Comments & Responses to Comment: Continuing Concerns**

### **Incomplete Native American Consultation on Cultural Preserve Zones**

58-7

We stand by our observation in our letter of March 3, 2003 that State Parks engaged in partial consultation, and did not accept Ms. Lucas' offer to sit down with staff, or go on site visits relative to the Plan itself, to indicate areas that would benefit from the cultural preserve designation and describe face-to-face why such preserve designation is so critical at the present time, especially for American Indian people. The responses to comments indicate that a resubmitted request to the NAHC sacred lands file was made on April 4, 2003. Ms. Lucas requests that Park staff share the results of that search with her in a confidential manner.

58-8

Similarly, while we understand that Parks may have sent a letter informing Native American groups about the General Plan, that so few Indians have participated to date may indicate that Parks needs to make even more effort to foster involvement to possibly include follow-up calls to the tribe's cultural or environmental departments, requesting to be placed on the Tribal Council's agenda, and/or other steps.

58-9

Moreover, the response to comment # 114, paragraph 2, is confused, and includes site visits to the Lucky 5 Ranch which elsewhere in the responses to comments by the Forest Service, Parks states is outside of the review of this Plan (see, i.e., RTC # 9). Parks cannot have it both ways; the Lucky 5 property is either in or out of the Plan process. Finally, Ms. Lucas has documented her concerns not only in her own correspondence and that of her counsel, but also through verbal requests and communications to Park staff and management. To date, no effort at additional, responsive consultation has been by Parks.

**#58-10** CSP's previous comments should not be interpreted as a "preference for recreation over stewardship." CSP prefers to accurately designate preserve boundaries based on sufficient, detailed inventory work. CSP is fully prepared to carefully delineate additional cultural preserves to the extent warranted by detailed data collection and the recommendations of management plans. The field visits of Spring 2004 represent data-gathering investigations that ultimately will be used to formulate land-use decisions within the park. Your client participated on several field trips, and her comments and new information are an important component of these ongoing studies. These studies incorporate the observations of State Park archaeologist, ecologists, and rangers, and will be compiled to develop management strategies for backcountry camping and other active recreation activities. CSP anticipates beginning work on a Cultural Resources Management Plan soon after approval of the General Plan. Decisions on the designations of new Cultural Preserves and recommendations for closing particular locations to camping or other recreational uses will be made at that time. The public will have an opportunity to comment upon such land-management recommendations within the Park.

**#58-11** Establishment of priorities is needed to provide the most effective management of limited funding due to the state budget and available park personnel. Protection of those resources of the highest quality and risk of degradation is the top priority of CSP at ABDSP.

**#58-12** Please see Responses # 13-2, 13-3, 58-2, and 58-10. CSP felt it would be prudent to study specific areas in the park with known high cultural sensitivity in greater detail during a subsequent management plan process, i.e., management plans will be subsequent to approval of the General Plan. It is the intention of CSP, as specified in the General Plan, to initiate planning efforts that study the current camping policy in close detail and the current level of protection provided to historical resources. These proposed management plans will follow approval of the General Plan and offer a means to carefully examine recreational uses in the parks and the condition of archaeological sites and other cultural properties within recreation areas. These management plans will then lead to the formulation of specific measures to treat resource problems and identify means to enhance the visitor experience while protecting resources. The closure of certain areas to camping and the designation of cultural and natural preserves are some of the management measures that could result from investigations conducted during the future management plans. Many of the park areas would be the subject of a focused cultural resource management plan. The results of these more focused studies may result in proposals to designate additional Cultural Preserves within the park. CSP would like to clarify that the Sundstrom case concerned a project-specific EIR, not a program level EIR that calls for subsequent public review of project-specific projects.

**#58-13** The list of relative acreage was simply an attempt to show relative emphasis. The purpose of the General Plan's Management Zones and Goals and Guidelines is to locate intensive uses, particularly new intensive uses, in areas that are less sensitive and to manage sensitive locations in areas of existing use through stewardship.

**#58-14** The analysis for the General Plan required under CEQA is to address the potential significance of new environmental impacts caused by implementation of the Plan. It is clear that the approval of the General Plan with the Goals and Guidelines that protect cultural resources, a new Cultural Preserve, and new State Wilderness offers substantial protection for cultural resources. No development is proposed in the GP/EIR that would impact these resources at the time.

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58-10 The responses to comments state that, "CSP was not willing to exclude many recreational uses based on large land use designations within those areas. Should additional studies indicate that cultural preserves are needed, the General Plan states such preserves may be designated after GP approval." (RTC # 167). This preference for recreation over stewardship is particularly troubling in light of the monitoring and inventory Ms. Lucas and Parks' staff conducted in Spring 2004 (this effort may be the camping inventory and mapping alluded to at the top of Comments & Responses, page 10-10), which already indicates that additional cultural preserves are warranted. Ms. Lucas' direct observations of these facts were documented in her confidential report to Parks dated June 28, 2004, which found an extensive amount of adverse impacts, and some permanent destruction, of sensitive cultural resource locations caused by open camping, camp fires, vandalism and vehicular incursions.

Post-Plan Approval Actions

58-11 We appreciate identification of "top priority" plan development by the team and management, including the Public Use Interface Element of the Cultural Resource Management Plan, Camping Management Plan and the Roads Management Plan, that these plans are funded and that two resource rangers have been assigned. Ms. Lucas also appreciates Parks' commitment to invite her to participate as a consultant on the development of these plans. However, the following concerns remain.

58-12 First, Parks is continuing to defer the majority of analysis of cultural preserve potential until after the General Plan is completed. *Sundstrom v. County of Mendocino* (1<sup>st</sup> Dist. 1988) 202 Cal.App.3d 296, 307 (court set aside a use permit when it held invalid a mitigation measure requiring an applicant to prepare technical studies after project approval, subject to approval by planning commission staff). Yet, the Draft EIR/Plan itself states that, "[t]he constraints of time, funding, and/or the means to collect and record data may impair California State Parks' ability to make effective resource management decisions by not adequately investigating all possible management options or implications." (Draft EIR/Plan, p. 3-26).

58-13 Moreover, the responses to comments improperly compares the relative acres proposed for cultural preserve to that proposed for public support facilities. (RTC # 167). Management "balance" is not found by trying to equalize those two numbers. The rich sensitive resources are where they are; that is a factor that cannot be changed, except by Parks allowing them to be destroyed. Similarly, a concern is not the acreage proposed for public support facilities, but rather their location relative to sensitive resources; factors that can be changed by moving the support facilities. The key is for Parks to sensitively site needed facilities, not just list relative acreage.

58-14 Second, we still question the Draft EIR's conclusion that impacts to cultural resources is below a level of significance (Draft EIR/Plan, p. 4-4) ("All potentially new adverse impacts will be avoided, minimized, or mitigated to a level of insignificance") particularly where the documents indicate that adverse impacts to pictographs and other resources caused by certain development and visitor usage are expected to continue.

**#58-15** As discussed on page 3-40 of the Plan, detailed visitor capacities will be addressed in subsequent management plans and will be based on the “desired future condition” described in the General Plan’s zone, goals and guidelines.

**#58-16** A General Plan would not typically answer this kind of detailed question, as much depends on both funding and staff availability. The Public Use Interface Element of the Cultural Resource Management Plan, Camping Plan, and Roads Management Plan is the highest priority post-General Plan effort for ABDSP. Data Collection has already begun but the current state fiscal crisis makes it difficult to set a completion date at this time. As soon as the funding picture becomes clear, CSP will notify the commenter’s client of a firm schedule for completion of the plan.

**#58-17** The proposed horse camp on the southern parcel of Lucky 5 has been dropped. Current funding for improvements to the Lucky 5 parcel will only go toward day-use area development along Sunrise Highway.

**#58-18** Access will be allowed to some areas of the Vallecito Acquisition and studies of natural and cultural features will be conducted as staffing and funding allows. Certain areas and features are already documented as sensitive and those areas will be restricted to public access initially. CSP welcomes the opportunity to continue consultation with your client concerning potential uses for the new Campbell Ranch acquisition parcel. CSP staff toured portions of the new parcel with her on 5/27/04. The information about past uses of this area of the park obtained at that time will greatly assist State Parks in making informed land-use decisions. CSP will contact her to work with park staff again. Other State Parks staff archaeologists and trained park volunteers, as well as, archaeological contractors have also conducted site survey work on selected areas of the Campbell Ranch parcel.

**#58-19** This would be desirable for cultural and natural resources, but is often not possible while the lands are privately held. As far as "associated collections,” the former owner of the Vallecito Ranch claimed to have no collections from the property, and in the middle of negotiations on the property, the owner passed away. CSP agrees that, when available, state park ecologists and archaeologists should conduct surveys prior to acquisition. CSP also agrees that local Native Americans should be consulted about their knowledge of the land and to convey their unique perspective about potential land uses. Please note that the *California State Parks Cultural Resources Management Handbook* provides guidance to CSP cultural specialists on consultation with Native Americans. It also will be useful to seek out former landowners and occupants of neighboring land to inquire about their knowledge of past land uses for the acquisition parcel. A records search would be conducted at the appropriate Historic Resources Information Center as part of the acquisition process, as well as, a records search for sacred sites information from the Native American Heritage Commission.



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58-14  
(cont'd)

(Draft EIR/Plan, pp. 4-14 – 4-15). Again, this is particularly troubling in light of the monitoring and inventory Ms. Lucas and Parks' staff conducted in Spring 2004 and mentioned above. The photos in that report speak for themselves.

58-15

Moreover, it appears no substantive attempts have been made to determine appropriate "carrying capacities" for these sensitive areas. (Public Resources Code sections 5001.96, 5019.5). The Goal and Guidelines at Plan, pages 3-40 to 3-41, appear to include (voluntary) data collection only, and do not amount to capacity determinations. No effort was made in the responses to comments to address this concern.

58-16

Finally, the Final EIR remains silent as to the expected completion dates for those two Management Plans as well as the proposed Cultural Resources Management Plan which would identify, evaluate and protect cultural resources, cultural landscapes and traditional cultural properties. (Draft EIR/Plan, p. 3-28). When can we expect such plans to be initiated and completed?

#### Status of Cultural Properties within the Lucky 5 Acquisition

58-17

As a culturally affiliated Native American to the Lucky 5 property, which will be integrated into the Anza Borrego Desert State Park, Ms. Lucas has walked portions of the north and south parcels with Parks' staff and management and has expressed her serious concerns about the proposed intensive public use of the southern parcel.

It was our understanding from Parks management that the proposal to develop the southern parcel with a horse camp has been dropped. However, response to comments # 65, 66, 116 may not reflect that understanding. Please immediately arrange for the appropriate entity to advise us in writing as to the status of that proposal on the southern parcel and know that our concerns for that area have not diminished. In fact, the Cedar Fire of 2003 revealed additional cultural resources in this area. We respectfully request this information well in advance of the Park Commission meeting later this Fall.

#### Other Acquisitions

58-18

The Plan states that the Vallecito/Campbell Ranch acquisition will provide opportunities for "all types" of camping, hiking, interpretation and visitor uses. (Plan, page 3-56). Ms. Lucas is a lineal descendant for this area (see, i.e., Cultural Resource Appendix, page 9-7). We have some concerns about that statement and request consultation on the management of public access to this area, especially those areas with sensitive archaeological sites. Further, surveys and consultation must be completed prior to public access being allowed to protect the significant and sensitive cultural resources within the Ranch.

58-19

When future land acquisitions for the Park occur, we strongly recommend that archaeological surveys be conducted whenever possible prior to the transaction documents being finalized, that qualified Native American monitors participate in those surveys and that any and all available associated records and collections from the



**#58-20** Please see Response #58-17. Area will not be closed to public access, as it is State Park property. The area will be available for trail use. Any other uses will be consistent with General Plan goals for the protection of cultural resources.

**#58-21** A general plan helps justify but does not create funding commitments. Park staff will do the best they can with available staff and support budget to maintain integrity of the Park boundaries. Please see Guideline 2c in the GP/EIR (which has been added). Approval of the GP/EIR should address your request. CSP will not prepare a ROD for this project because it is not federally funded.

**#58-22** CSP believes that the broad land use designations for Natural/Cultural Preserves removed too much land from visitor use without further study. CSP prefers to accurately designate preserve boundaries based on additional sufficient, detailed inventory work. CSP is fully prepared to carefully delineate additional cultural preserves to the extent warranted by detailed data collection and the recommendations of management plans. The Goals and Guidelines in Section 3.3 were changed to provide additional resource protection. CSP respectfully disagrees that CSP should adopt Alternative 3 or a modified Alternative 3 because their adoption may unnecessarily cause adverse effects on recreation. The Management Plans will provide the detailed analysis necessary to protect the Park's resources while allowing recreation comparable to existing recreational uses.

**#58-23** All zones, including focused-use zones, remain subject to the constraints found under the State Park classification (PRC 5019.53). Historic resources will be considered under the Secretary of the Interior's Standards for historic preservation. Please note that in Figure 6.6, all of the Lucky 5 Ranch is shown as Backcountry Zone. CSP notes that the commenter does not support a horse camp on the south parcel of the Lucky 5 acquisition.

**#58-24** Please see Response 58-16. There is both a cultural and natural component to the Public Use Interface Element of the Cultural Resource Management Plan, Trails Management Plan, Camping Management Plan and Roads Management Plan.

**#58-25** A copy of the NOD will be sent to The commenter's office. Copies of the Final EIR and Public Comment/Responses will be available for sale on disk or by hard copy for the cost of reproduction. Additionally, the Final EIR and Public Comment/Responses will be available on the CSP website.

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58-19  
(cont'd)

property be included in the acquisition. Such steps will insure that Parks will be maximizing the benefits for the public, tribal stakeholders and its own resource staff. Such policies would have been of great benefit during the acquisition of the Vallecito/Campbell Ranch. Can Parks work with the sellers of the Ranch to see if any associated collections still exist and could be also conveyed to the State?

*Relations with Nearby Private Property Owners Needs Improvement*

58-20

As a private property owner with land adjacent to the Plan area (see Figure 6.2 Adjacent Land Ownership), Ms. Lucas has concerns about introducing additional and potentially intensive recreational uses into the area near Sunrise Highway and the Lucas Ranch, including at the Lucky 5 Ranch. Again, what is the proposal for public access to the south parcel?

58-21

We appreciate response to comment # 117, which states that boundaries between private land and the Park will be clearly delineated, patrolled by rangers and that hunting will be prohibited on Park property. We respectfully request that these promises be formally adopted as mitigation measures in a ROD and that they be sustained through adequate funding.

*Conclusion*

58-22

Overall, both the Preferred Alternative and Alternative 3 propose important protections to the sensitive desert environment. However, based on the information provided, we believe that State Parks must select a modified Alternative 3, the Environmentally Preferred Alternative, to conform to CEQA. We prefer it because it places more sensitive areas in cultural preserves. No serious attempt has been made to demonstrate with substantial evidence that such an alternative is infeasible.

58-23

The modification we would like to see to Alternative 3, specifically relates to conservation of the Lucas Ranch and blends a small piece of Alternative 2 for the adjacent areas north of the Ranch, providing more Backcountry Zones and less Focused Use Zones on the southern Lucky 5 parcel. Again, please note that we continue to not support a horse camp on the south parcel of the Lucky 5 Ranch acquisition.

58-24

If the Preferred Alternative is selected, we request that the cultural and natural resource management plans be prepared immediately following approval of the Plan to help provide baselines for other management plans. We would again like to see no or very little focused use in the area north of the Ranch and the south end of the Lucky 5. In general, we strongly oppose Alternatives 1 and 2 which would allow for significant, and irreparable, impacts to sensitive resources.

58-25

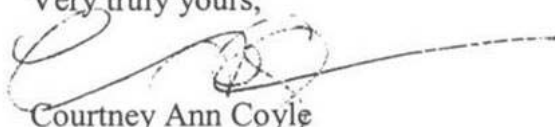
Thank you for your courtesy and cooperation and for your promise to send notification of the Commission hearing to my office and a copy of the NOD, if the project is approved. We also respectfully request a copy of the Final EIR and the Final Plan for our files.

## California State Parks Response

**Comment Letter 58** – Courtney Ann Coyle, Attorney At Law

Final General Plan letter  
September 13, 2004

Very truly yours,



Courtney Ann Coyle  
Attorney at Law

✓ Encls. 2 (Carmen Lucas August 8 and 31, 2004 letters)

Cc: Ruth Coleman, Director DPR  
Wayne Donaldson, State Historic Preservation Officer  
Mat Fuzie, DPR Superintendent  
Mike Sampson, Associate State Archaeologist  
Larry Myers, Native American Heritage Commission  
Katherine Saubel, Tribal Chairwoman, Los Coyotes Indian Reservation  
Steve Banegas, Spokesman, Kumeyaay Cultural Repatriation Committee  
Ms. Carmen Lucas

**#58-26** Through GIS data and cultural resource staff estimates, approximately 8 percent of the Park has been thoroughly surveyed. However, there is good archaeological survey coverage for many areas of ABDSP. CSP has adequate site data on areas of the Park where modern-day recreational uses are concentrated, including Borrego Palm Canyon, Tamarisk Grove, Blair Valley, Mine Wash, Mountain Palm Springs, Bow Willow, Fish Creek, Lower and Middle Willows, and other locations. This site information is “adequate,” in that CSP knows where many archaeological sites are located, what the constituents of those sites are, and how they correlate with public facilities or public use patterns.

The volunteers who participate in archaeological fieldwork within the park have gone through a training course provided by staff archaeologists. The volunteers always work with professional staff archaeologists in conducting the fieldwork, so oversight is built into the use of volunteers. The volunteers do not make land-management decisions relative to archaeological sites or historic structures in the park.

The alternative to acquiring lands is to let them go to second party private landowners or private developers. The Park's program and partnership with donors, land conservancies, and the Anza-Borrego Foundation, is to maintain natural and cultural corridors that have been used for thousands of years, rather than stand back and allow the land to be fragmented by development. The volunteers of the Colorado Desert Archeological Society have provided tremendous support to the science of cultural resource protection, as well as site monitoring and stewardship. In addition, CSP has far more salaried staff to focus on cultural resources than ever before. Cultural resources specialists from the Cultural Resources Division and the Service Centers are also available to assist district archaeologists in managing and protecting cultural resources.

**#58-27** The changes you requested here will be made in the Final General Plan document. CSP is aware of the differences in the two names. The name “Kumeyaay” was employed in the text, rather than, “Kwaaymii,” simply because the former term is more universally recognized.

**#58-28** The “Issues” section of a General Plan should outline all of the potential problem areas faced in adequately managing specific types of resources in the park. The “Cultural Resource Issues” section discusses natural forces or human activities that potentially can damage or even destroy archaeological sites and historic properties. All archaeological sites, either prehistoric or historic, are components of the landscape and thus subject to the forces of erosion, flood, earthquakes, effects from human recreation, etc. The “Cultural Resource Issues” section also attempts to summarize some possible treatments for these potentially damaging forces. This is not meant to imply that the destruction of the park’s cultural resources is imminent. If the park managers who read this document are made aware of these issues, they are then better prepared for finding solutions to the problems.

**#58-29** It should be noted that ABDSP does not hold large collections from archaeological sites in the Park. Much of the archaeological collections are curated in CSP’s West Sacramento Archaeology Lab. This facility is adequately staffed and has state-of-the-art storage equipment. ABDSP’s research facility is managed by a qualified curator. A small collection of artifacts is curated at the UCLA Fowler Museum facility. San Diego Museum of Man has archaeological material collected from the Park, as well.

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8 August 2004

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Ref: Anza-Borrego Desert State Park Preliminary General Plan and DEIR sch#  
2002021060

Dear Courtney

I have spent a number of days reading the Anza-Borrego General Plan. My thoughts are as follows.

58-26 If only 8% of the park has been surveyed for archeological resources, then the Park does not know what they have or how to manage it properly. Yet Anza Borrego State Park continues to have an aggressive successful program in acquiring additional lands knowing full well that they do not have the resources to manage, let alone preserve and protect. It sounds to me that they acknowledge the funding and staffing limitations and as such will continue to be dependent on volunteer staff to do the Cultural Resource requirements and what ever else they can get from those volunteers. I cannot help but wonder if that is really a good management tool for the long term "protect and preserve". I am not convinced that having volunteers working in various capacities with all the issues that Archaeology can have is a good idea. When it comes to the inventory control of prehistory a more than adequate professional performance by paid professionals should be the requirement.

58-27 The photograph in section 2 of the so-called "Yonie" is not appropriate in a public document. Page 2-63 talks about settlement patters of the Kumeyaay. "Kumeyaay bands living in the Laguna..." needs to be changed to Kwaaymii. As does the 2<sup>nd</sup> paragraph, "The Kumeyaay had a well..." Change to Kwaaymii.

58-28 Page 2-103, 2.4.3, Talks about the Cultural Resource Issues. Who wrote that Dume and gloom? If sites with in the over all San Diego area are still being located after 10,000 years, what makes them think that all the Culture Resources will disappear?

58-29 The Plan goes on to address the Parks Existing Collection Conditions and Issues. Section 2.2.6 address Collections Resources and states that "Most

**#58-30** The San Diego Museum of Man is engaged in a repatriation program, as mandated by NAGPRA. It is our understanding that collections subject to NAGPRA have been set aside from the general archaeological collections. The San Diego Museum of Man has a long history in the Museum business and they have curators and anthropologists on their staff. Your suggestion to consider transferring the ABDSP collections from the Museum of Man to the San Diego Archaeological Center is interesting and will be investigated.

**#58-31** The archaeological studies directed by William Wallace within ABDSP were performed under contract to CSP. All of the work conducted by William and Edith Wallace were performed in the south half of the Park. At the time of that work, it was common professional procedure to make collections of surface artifacts during site surveys. There was also a great concern about unauthorized artifact collecting within the Park. The artifact collections resulting from the site surveys and test excavations conducted by William and Edith Wallace and Dr. Wallace's students are described in numerous reports produced by the Wallaces. Copies of those reports are on file at CSP offices and various local college libraries. The collections are stored at the Park.

The archaeological work directed by the late Dr. Clement Meighan (UCLA Anthropology Professor) included site surveys in the north end of the Park and limited test excavations. The collections from that work are curated at the UCLA Fowler Museum. Reports about the work directed by Dr. Meighan were published in the *UCLA Archaeological Survey Annual Reports* series.

Robert Begole conducted archaeological site surveys throughout ABDSP during the 1960s through 1980s. Though Mr. Begole was not a professional archaeologist by educational background, he had considerable volunteer archaeological work experience prior to beginning work within the park. The results of Mr. Begole's fieldwork are described in several articles in the *Pacific Coast Archaeological Society Quarterly*, a well respected archaeology journal. Copies of those articles are on file at the Park and at San Diego State University Library. Back issues of the *Quarterly* can be purchased directly from the Pacific Coast Archaeological Society. The limited number of artifacts collected by Mr. Begole, have been cataloged and are currently being analyzed.

Materials gathered during the various phases of excavations at Indian Hill Rockshelter represent the largest archaeological collection obtained from within the Park. Those collections are stored at CSP's West Sacramento facility. The Wallaces conducted limited-scope test excavations here first in 1958 and later in 1961. Subsequently, CSP gave a contract to UC Riverside (directed by Dr. Phil Wilke) to more fully excavate the interior of the rockshelter. The results of that work are the subject of a 1986 report by Dr. Wilke and others and a 1992 Ph.D. dissertation by Meg McDonald.

**#58-32** There are several ceramic vessels or ollas stored at the Park. A significant number of these ollas were collected by park visitors and then turned over to park staff. Other ollas were collected by CSP staff during fieldwork within the Park. The Colorado Desert District Archaeologist has prepared a proposal to have the Park olla collection analyzed by an expert on regional ceramics. CSP does recognize the strong research and cultural values of the collection of ceramic vessels stored at ABDSP. There is no current evidence that any of the ollas in the park collection are burial related or have an association with Native American ceremonies; all ollas referred to in Section 2.2.6.4 were isolated finds.

Please see Responses #58-29, 58-30, and 58-31 for more information of where artifact collections are presently stored. The archaeological collection from Ocotillo Wells SVRA referred to in Section 2.2.6.4 is the material obtained during investigations at the Barrel Springs Site. That site was located within ABDSP in 1977 when the project took place. The Barrel Springs Site collection is curated at the CSP West Sacramento facility.



58-29  
(cont'd)

ABDSP collections are adequately housed in the Stout Research Center. My question: Is "adequately" less than "Curation Standards"? What does "adequately" in temperatures of extreme hot and cold year round really mean?

58-30

Section 2.2.6.3, Relates the Collection History, stating that M. Rogers of the San Diego Museum of Man performed the first systematic archeological studies of the region during the early decades of this century through the 1940, (the collections are stored at the San Diego Museum of Man).

My questions are:

1. Has Repatriation issues been dealt with?
2. Are the Museum of Man collections in tact, and are they curated according to curation standards?
3. Why not have the collections transferred to the San Diego Archeological center? While at the Center the artifacts could be brought up to curation standards if needed. It is my understanding that a good portion if not all the funding has been acquired for Anza-Borrego State Parks to start ground braking to build a new Curation facility for the Archeologically of the Anza Borrego State Parks. Once the new facility is up and running than the artifacts form Anza-Borrego could be transferred to that facility.

58-31

Section 2.2.6.3 The Collection History, goes on to state that during the late 1950s and early 1960s, Archaeological materials were recovered during investigative surveys by C. Meighan of the University of California Los Angeles, and W. Wallace of the University of Southern California. It does not state where those collections are located, nor what shape they may be in. Why? Then the paragraph goes on to state that the content of the archaeological collection has significantly increased over the past several decades as the result of surveys and research by R. Begole of ABDSP, site specific research studies (under DPR-412-A permits), resource and site assessments, and from mitigated development projects (Jefferson 1997). "Archeological investigations at prehistoric and historic sites continue to contributed specimens to the collection". Am I to assume that artifacts from those projects are housed at the Stout Research Center (DSRC) at Anza-Borrego State Parks Headquarters? Have studies and analysis and all of the reports from such resource and site assessments or mitigated development projects been completed, produced and published and are they on file?

58-32

Under Collection Content Summary 2.2.6.4 it states that Archaic through Late Prehistoric archaeological artifacts include a wide Variety of flaked and ground stone tools, shell and wood items, ecofacts and a large and significant collection of ollas. I wonder what "a large and significant collection of Ollas" really means? Is it numerous, is there a grate variety in design, clay sources, what were they used for? Has a researcher looked at and analyzed the entire collection? Has a research paper been produced? Are any of the ollas NAGPRA issues? The summary goes on to sate that some archaeological objects are on exhibit at the ABDSP Visitor Center. Than it states that Cultural Artifacts from ABDSP and

**#58-33** Section 2.2.6.6 refers to archaeological collections from sites lying outside ABDSP, but are similar in content and date to collections from the Park. The article by Margaret Weide on collections from the Yuha Desert is found in a 1976 monograph entitled *Background to Prehistory of the Yuha Desert Region*, edited by Philip J. Wilke. In the 1976 article, Dr. Weide points out that the San Diego Museum of Man, the Archaeological Survey Association of Southern California (ASA), and UCLA have the largest collections of archaeological materials from the Yuha Desert and places next to the Park. The ASA collections may now be stored at Imperial College Desert Museum; CSP has not directly confirmed it with the Museum.

**#58-34** CSP has a sizable staff of curators throughout the park system who care for collections. In addition, CSP has assigned specific staff members to manage our obligations under NAGPRA. CSP also has a committee that reviews all requests for repatriation of State Parks collections. This system of complying with NAGPRA has been in place for many years.

**#58-35** CSP recognizes the obligation and, even, legal mandate to curate archaeological collections using standard professional procedures and facilities. CSP does operate curatorial facilities. In addition, CSP is looking to establish a working relationship with the San Diego Archaeological Center for curation of certain southern California collections.

**#58-36** The Cultural Goals and Guidelines do not specifically refer to curation of archaeological materials. Goals and guidelines for collections (including, archaeological and ethnographic materials) are addressed in Section 3.3.1.6.

**#58-37** Please see Response # 17-14. Additionally, due to reproduction costs of approximately \$4.00 dollars per page for color reproduction of the three Alternative Maps (11x17, two sided), costs of the hard copies would have been \$12.00 more a copy. When CSP originally placed the Alternatives into the electronic file for the General Plan/EIR, they were made black and white and the insets on the back were added for clarification. The Alternatives were presented to the public during Public Information Meeting #2 in color.

58-32  
(cont'd)

Ocotillo Wells SVRA are stored at the California State Parks Archaeology Laboratory in West Sacramento, the Borrego Archaeological Research Center at ABDSP, and DSRC.

58-33

Section 2.2.6.6 summarizes the relationship of collection to other State Parks and Non-State Park Institutions. It is stated that Large collections of late prehistoric and historic archeological materials from the ABDSP area are conserved at the C.W. Bowers Memorial Museum, the Phoebe Hearst Museum, the Phoebe Hearst Museum, San Bernardino County Museum, University of California Berkeley, the San Diego Museum of Man, San Diego State University, Antelope Valley Indian Museum, and the University of California Los Angeles. And that the collections content of archaeological museum materials, recovered from locations immediately south of ABDSP (i.e., Coyote Mountains, and Yuha Desert of Imperial and southeastern San Diego Counties) is summarized by M. Weide (see Jefferson 12997). Is that Imperial Valley Collage Museum?

58-34

Who keeps track of all those collections? Are site visits made to review the collections? How long are Anza Borrego Artifacts at these other institutions? Have NAGPRA and California NAGPRA issues been taken care of?

58-35

If funding and space for Curation is the problem than a Memo of agreement could be worked out with the San Diego Archaeological for assistances with curation. It seems to me if the State Parks dug up the artifacts than it has a moral obligation to find the funding to provide for sufficient professional curation standards to bring all the collections together and than do something intelligent with that entire collection. If that cannot be accomplished then serious thought must be given to returning the artifacts to where they came. [REDACTED]

58-36

Chapter 3, Section 3.3.1.4 of The Management Zone, address Cultural Resources, and states that ... "Due to California State Park's Mission and PRC 5024, such resources must be protected or treated according to accepted protocols for National Register sites. Large expanses of the Park have never been systematically surveyed for cultural resources, so the potential discovery of additional sites is great." Than it goes on to describe the GOALS. My thoughts above about collections apply hear as well.

58-37

Part 3.2.4 of the Management Zone provides the Alternative Maps. I find it interesting that Figure 6.6, the "Preferred Alternative" is the only map in color. I do not under stand how the Park Managers can say to the general public that they have chosen a "Preferred Alternative" when the Roads and Management Plan study has not been completed. Making the choice on preferred alternatives with out considering the result of the Roads Management Plan is premature, (See my letter to Sampson dated 28 June 2004). (I understand that the Roads and Management Plan is a so called "living document", however the information acquired from that review seems to me should be included in the decision process in selecting the appropriate Alternative.)

**#58-38** Both Alternative 2 and the Preferred Plan show only Backcountry zone in the southern parcel, west of Sunrise Highway. In a Backcountry zone, there would be no developed primitive campground as was previously proposed under the FUZ II in the January 2003 Preliminary General Plan/DEIR. Please also refer to Figure 6.6.

**#58-39** The campground mentioned was a primitive horse camp that was originally proposed to be developed on the southern parcel of Lucky 5. This proposed campground has been dropped from the project. Trail access will be developed with the Trail Management Plan, currently in the initial planning stage.

**#58-40** Your point about keeping information on cultural resources confidential is a good one. Specifically, the location of archaeological sites, sacred sites, and other identified traditional cultural places must be kept confidential by law. The procedures for data collection used during any Management Plan will reflect this legal mandate; only CSP personnel with a need to know will have access to site location information.

58-38 It is hard to tell, but I think Alternative 2 is the best from me. However I would like your thoughts before we put it in writing. As I read the Maps, \\\\\\\ = proposed Back Country, and lllll = proposed Focus use Zone 2. Alternative 3 shows a number of proposed natural/cultural preserves, but the area close to the ranch looks like it will fall in to lllll = focus use zone 2. If that is correct then they still plan to develop camping, and equestrian corrals etcetera on the land close to the Lucas Ranch. If I am understanding what I see than I am left with Alternative 2, as I look at the map it shows \\\\\\\ = Back Country, if I am right than that = little if any development of camping and or equestrian development close to the ranch. Do you agree?

58-39 3.3.2.4 Lucky 5 Ranch Area "The feasibility of placing an equestrian staging a area and campground is currently being investigated". Than it list two Goals, the last sentence says Development overall shall be kept to a minimum except to provide a campground and trail access. What kind and where?

58-40 3.4.4 CULTURAL RESOURCES MANAGEMENT PLAN states that a plan will be developed separately from the General Plan, ... I think this is O.K., but it should also spell out that the "living plan" should be kept " Confidential and Exempted from Freedom of Information and Public Records Act" so that [REDACTED] and the like can not get their hands on it. book writers

As always it is too much information to have to wade through, but I hope that this is useful to you and as always, thank you for all that you do for me, I truly appreciate it.

Sincerely,

  
CARMEN LUCAS  
Laguna Mountain, California

**#58-41** The General Plan mandates that equestrians must stay on designated roads and trails within all State Wilderness and are not allowed in Cultural Preserves. Any new development such as campgrounds must be carefully reviewed by CSP, as mandated by CEQA, PRC 5024, and the CSP Resource Management Directives. Additionally, please see Guidelines Recreation 2a and 2g.

**#58-42** Please review Response # 58-28. The Issues Section of the General Plan should identify all potential problem areas as they relate to archaeological sites, historic buildings, and other significant cultural properties. As a result, the General Plan can better guide park staff in their decision-making process; alerting them of issues and problems which may need resolution. Note, also, that archaeological sites are a part of the natural landscape, and thus are subject to natural erosion and possible damage (even if inadvertent) by park visitors. CSP is proactively documenting and protecting archaeological sites in ABDSP to enhance current park operations and to provide additional data for the future management plans. A number of measures have been taken and new programs initiated to accomplish the latter tasks. They include (but are not limited to), conducting archaeological surveys to revisit known sites and update their records, initiating an Archaeological Site Steward program (where trained volunteers monitor the condition of specific sites), adding interpretive programs about archaeology and prehistoric cultures, etc.

CARMEN LUCAS  
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31 August 2004

Courtney Ann Coyle  
Attorney at Law  
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Ref: (a) My ltr dtd 8Aug04  
(b) Anza-Borrego Desert State Park Proposed Changes to Preliminary General Plan and Public Review Comments & Responses.  
(c) Carmen Lucas, Memorandum to record; Anz Borrego Desert State Park Cultural Resources Management Plan Project dtd 26Jun04

Dear Courtney:

As you know my thoughts about Anza's General plan are reflected in reference (a). Additionally you have asked for my thoughts on the Public Review Comment and Responses dated November 2003.

58-41 I guess the first glaring thing to me is considering the total <sup>population</sup> ~~populist~~ that recreate in the Anza-Borrego Desert from, San Diego, Imperial Valley, Orange County and below the Border, only the Organized Equestrians, the Organized OHV and few others have commented. The OHV care so much they sent the same word for word letter in three times under three different names. As for the Equestrians, having ridden horse for many years, I don't see that they over all do much damage on the trails. Seems they could probably ride any where and not ~~due~~ <sup>do</sup> much damage. However it seems to me that limiting number of horses at a time on trails might be prudent. Its not horses on trails that concern me, it is putting Horse camps on and near Traditional Cultural Landscape and pre-history sites that concern me.

58-42 Page 10-5, Section 2.4.3 Cultural Resource Issue. What a negative no hope assumption. Who wrote that? I think I have said some place before that if Archeologists are still finding pre-history deposits that date beyond 10,000 years in San Diego alone, what makes some one think that all physical remains of past human use will eventually be removed? "The potential for vehicular traffic running through Archaeological sites is good in the park." Are they bragging? If they are mandated to "Preserve and Protect" Why don't they relocate the roads, why do they wait ~~to~~ to point it out in the General Plan when common <sup>since</sup> ~~sense~~ <sup>sense</sup> should tell them to take steps to protect those sites.



**#58-43** The narrative in the General Plan serves to highlight that the magnitude of the cultural resources is significantly beyond available staffing and funding levels. The “Cultural Resources Issues” section was written to outline all potential problem areas relative to recording, protecting, and interpreting archaeological sites. This discussion in the General Plan can help to justify future funding to accomplish important inventory work. CSP disagrees that state employees are not doing an adequate job simply because, not all the necessary inventory work is being accomplished. CSP cultural resource staff follows current professional standards, and, with help from park volunteers, are accomplishing projects within ABDSP. Please also see Response # 58-42.

**#58-44** Cultural resources have their own budgetary process in the State Park System, and the funding is equally split between natural resources and cultural resources, so the statement that biological resources "have more clout and resources for management" is inaccurate. A recent \$250,000 donation by a park volunteer will provide for a new Archeological Research Center for the District's collections, accessioning, research, and classroom studies. The Colorado Desert District was one of the first districts in the State Park System to have its own Archaeologist on staff.

**#58-45** CSP is committed to having the staff necessary to perform the specialist work necessary to protect our natural and cultural resources. While there are more cultural staff and volunteers in the Colorado Desert District and in ABDSP now than ever in the history of CSP, the state budget continues to constrain our ability to hire all the staff that is really needed.

**#58-46** Please see Response # 58-10.

**#58-47** CSP recognizes not only the importance of this Goal but the inherent difficulty in achieving it because water is a scarce but vital commodity in the desert. Park management coordinates with the various agencies having jurisdiction over the water rights within and adjacent to the Park.

58-43

Page 10-6 "The vastness of Anza-Borrego Desert SP poses an issue of the feasibility to conduct regular or periodic Archaeological fieldwork. The rugged terrain and the remoteness of many important Archaeological sites make access to potential work locations difficult and time-consuming". <sup>Job</sup> ~~Too~~ bad, that's what they get paid to do. If the job can not be done, then Management at the highest level has the moral obligation and indeed the responsibility to ensure that the number of professional personnel and funding are in place to do the job., not excuses or become dependent on volunteers. Policy's should be set in place that require *Policies* routine visits to Archaeological locations by professional archaeologist who are held responsible to assess the conditions, take appropriate action if required, submit repots and establish a follow-up policy and procedure. Such personnel should be held responsible to see that reports are written in a timely manner and that follow up takes place in a timely manner. (not three to twenty years later). Consequences should accrue if the job is not done. The Archaeological history is not just Indian, it goes to the very core of Californian and indeed the United States History, it can not be allowed to fall in to despair due to so called "difficulty and too time-consuming" excuses. The tax payers deserve better and believe that Anza-Borrego Desert SP, is protecting land from developers and looters as well and that its history is being protected as well.

58-44

Since Indians were dependent on the environments biological resources in there entire existence why isn't Biological and Archaeological functions with in the agencies married? It seems that the biological side of the houses have more clout and resources for management . It just seems that ~~they~~ should be under the same umbrella.

58-45

Instead of being dependent on volunteers, why can't funding be acquired as a budget item to create entry level jobs for college students who are studying Biology and Archaeology? How may youngsters finish their expensive schooling and can't get jobs because they don't have experience or don't know the right people?

58-46

Page 10-8 Section 3.2.4.6 – Cultural Preserve Zone. I still say out of the entire Anza-Borrego State Parks they can only set 428 acres aside for Cultural Preserve?. As much Archaeology that there is out there they need to set aside a entire corridor. See annotated map provided to Michael Sampson, state Representative; (Reference C)

58-47

Page 10-9 Section 3.3.1.2 – Physical Resources (re: response #15)  
Under "Hydrology," change the first goal to read: Protect the surface water and groundwater of ABDSP. Strive to restore sustainable and functional watersheds and groundwater basins through out the region". GOOD LUCK!  
This has to be given the highest priority, not by just Anza-Borrego State Parks but by the County Officials and any other officials who participate in the decisions of water management any where. It seems to me that it would be prudent to discontinue all water extraction that is not necessary to the health and welfare of

**#58-48** CSP recognizes the issues associated with backcountry camping on or adjacent to cultural resource sites. Please see Guidelines Recreation 2a and 2g. Please also see Response #58-10.

**#58-49** Please see Response # 58-11

**#58-50** An item about curation has already been added to the list of measures to be accomplished in a Cultural Resources Management Plan for the Park. The General Plan, too, addresses curation of collections under Section 3.3.1.6.

**#58- 51** Please see Response # 58-6. The procedures for the disposition of human remains, if found, are already well established by State Law and by procedures in the *California State Parks Cultural Resources Management Handbook*, which is used by all CSP cultural specialists. The same types of mitigative measures and treatment procedures are normally written into most CSP project contracts and associated environmental documents, depending upon the scope of the proposed work.

**#58-52** CSP recognizes the continuous danger of wildfire within and adjacent to ABDSP and has developed proactive strategies (including prescribed burns), emergency plans, and coordination efforts in response to that danger. Please see Response # 58-47.

58-47 (cont'd) | the general populous until and when an adequate recharge and recovery takes place.

58-48 | Page 10-10 Section 3.4.1 – Backcountry Camping Management Plan. "... the Camping Plan, and will guide where camping can occur without affecting sensitive cultural resource". Move camping away for all Culture Resources. Discontinue the practice of ground fires and or provide a means for the public to dispose of the charcoal with out dumping on the ground. (See Ref (c) Sampson Memo).

58-49 | "Areas of ABDSP now open to primitive camping may be recommended for designation as a Cultural or a Natural Preserve". This should be a priory and be completed as soon as possible.

Section 3.4.2 Roads Management Plan. See reference (C)

58-50 | Section 3.4.4 Cultural Resources Management Plan (re: response #31) An additional bullet will be added to read: Formulate measures for curation of archaeological and historical collections". There has to be budget requirements and fulfillment to that budget requirement that requires preservation and protection of all archeological areas and to conduct appropriate curation according to federal curation standards. (Isn't there legalization that requires such funding? How can it be mandated to preserve and protect with out also mandating appropriate and sufficient funding??) *legislation*

58-51 | Page 10-11 Section 4.5.3.5 Mitigation CR –1 "Change fifth sentence to read: If cultural remains are uncovered during a project, work will be controlled and redirected to allow resource recordation, recovery and/or protection development." Policy should also be set on the discovery of questionable bone. If the Archaeologist suspects that any bone may be human than that bone must be I.D. as soon as possible. However due to the numerous locations through out both Anza Borrego and Cuyamaca of burial grounds any remains must be left in place and the public's use of such area is to be rerouted/relocated. The location is to be listed with the N.A.H.C as soon as it may be discovered that Human remains are part of the Cultural Resource area. All related information is to be kept CONFIDENTIAL, EXEMPT FROM THE FREEDOM OF INFORMATION ACT. This information is to be under the control to the Archeologist not any other department. (Keep [REDACTED] out of their records).

58-52 | Page 10-21 *book writers* "2 Under funding from the National Fire Plan, the Forest has increased our efforts in hazardous fuel reduction (both area-wide prescribed burns and fuelbreak maintenance) to reduce the risks of catastrophic wildfire and threats to private property. Our 5-year fuels planning includes a project in the vicinity of Lost Valley (near our common border) and in the northern portion of our Laguna Recreation Area (also near one of our common boundaries) Forest staff can provide you with further information on these project at your

**#58-53** The sentiment about Cultural Preserves becoming attractions to the general public is also a concern of CSP. That was one of the reasons CSP did not designate additional preserves within ABDSP. CSP believes that wilderness designation can accomplish protection of the archaeological sites and traditional cultural places without possibly endangering significant cultural properties by giving them a special title. There are other means to help protect the special cultural resources within the park, including interpretation, use of Site Stewards, increasing awareness of cultural issues among the ranger and maintenance staff, more archaeological investigations within the park, well-placed signs, redirecting visitor uses away from sensitive resources, and others.

**#58-54** The comments to the Feb 19, 2003 MND are no longer relevant, because the proposed campground has been eliminated from the project and a new environmental review will need to be implemented in the future.

**#58-55** CSP shows all comment letters as part of the CEQA process. No other response is necessary.

**#58-56** Please see Responses #s 13-2, 13-3, 14-1, 14-3, and 58-10.

**#58-57** The goal of park policies should be to protect, preserve, and interpret cultural and natural resources while also providing quality recreation opportunities to the public. This ideal can be achieved. CSP agrees that impacts to cultural resources should be eliminated, and avoided when creating designs for new facilities in a park.

58-52  
(cont'd)

convenience, to supplement Section 3.3.1.3 of the draft Plan". Needless to say the Forest Service Hazardous fuel reduction to reduce the risk of catastrophic wildfire and threats to private property was too late and a dollar short. (Cedar Fire Oct 2003), However the danger of another catastrophic wildfire continues. The real issue is the continued extraction of water beyond the basic need with out a sufficient recharge to replace what has been extracted. Water is one of the most sacred elements and needs to be respected and used thoughtfully.

58-53

6 "Section 3.2.4.6 CULTURAL preserve Zone, proposes to designate the San Felipe Cultural Preserve with "an extremely low level of visitor impact" From our experience, designation of special area (federal Wilderness Area, among other) invited an increase in the number of visitors (to view the "special" area). Your plan may need to consider this Zone as an attraction and therefore the need to identify methods of reducing resource and visitor conflict."

I agree that it is a hard one to balance, however it seems to me that Cultural Preserves need to be created. They don't have to call them "Cultural Preserves" put them under Biology, and name it that.

58-54

Page 10-22 "#9, Lucky 5 Ranch Acquisition and Public Use improvements SCH# 2003021099 is a separate project from the Anz-Borrego Desert State Park General Plan under CEQA. Page 10-23, (9 We have received a copy of the February 19, 2003 Lucy 5 Ranch Acquisition Initial Study & Mitigated Negative Declaration and our comment on this planning effort will follow at a later date". Were those comments submitted and what were they?

58-55

Page 10-31 and 32 it the San Diego Audubon Society letter. I Echo "Resource protection, encourage the State legislature to provide adequate funds to increase field staff (Rangers and Archeologist). ...see expressions of concern added to the plan concerning the long-term effects on the Park of the current severe overdraft of water in the valley. "It would seem to make more sense to have specifically designated off-road camping area in the WZ. ..urge that the Camping Plan be expanded to include the Wilderness Zone, and to designate specific camping areas" #22, ...we wonder if the Cultural Zone needs to be quite as extensive as is show?" They do not understand how much is out there, It is not big enough!

58-56

Page 10-37 Save Our Heritage Organization ltr. "...Wilderness does not provide adequate protection for the historic and prehistoric site in Anza-Borrego Desert State Park. There should be no camping and only limited access to areas containing sensitive cultural resources." I agree.

58-57

Page 10-39 "...existing departmental cultural resources directives, adequate protection while allowing recreational users access to those areas that are not significant prehistory/historic sites." Without testing how does the department know if a resource is "significant" or not. No impacts to any Cultural resources should be the goal!

**#58-58** Thank you for your input on the issue of curation of collections. CSP employs many personnel who are well qualified to work on collections matters. CSP endeavors to consult with Native Americans about collections issues. CSP is presently working out an agreement with the San Diego Archaeological Center regarding curation of selected collections.

**#58-59** Please see Response # 58-39.

**#58-60** Thank you for your thoughts on the policy of open camping. The Focus-use Zones proposed in the current draft General Plan help address this issue, as park visitors must camp in specific, designated locations. This policy could be expanded to many other areas of the park in an effort to direct camping and other active recreation away from sensitive resources (see, also, some of the proposals in the Area-Specific Goals and Guidelines). As work on Management Plans are initiated and progress, other directives to protect archaeological sites, sensitive habitat, geologic features, etc. likely will be recommended for implementation within the Park.



58-58

Conservation

Page 10-10 "Currently there is a curation facility and a qualified collections manager on staff at the Park, and active planning has begun for constructions of an archaeological center at the District office complex." I would recommend that a Memorandum of agreement be worked out with the San Diego Archeological Center for assistance with the Archaeological Collections and that ~~Consolation~~ with all the Indians who claim the Colorado Desert as Traditional home land be consulted as to what they may or may not want to see as a Archeological center.

58-59

Page 10-128 #116, "...Carmen Lucas has been involved in the design for the Lucky 5 Public Use Plan to assist in identifying cultural resource sites and avoiding or minimizing impacts to archaeological sites." What does all this mean? And where are we, on the Lucky 5. I am of the understanding that the Horse Camp is not a go. Am I right? Are they talking about our walking the trail with Sue Wade?

58-60

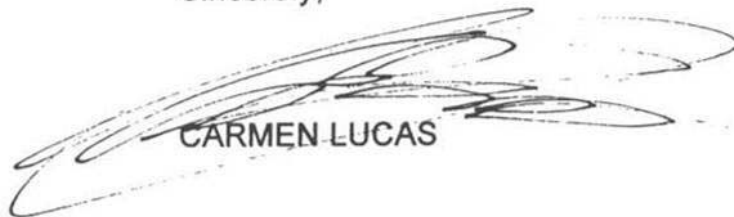
Page 10-130 Am I being patronized? Don't

There is a lot of verbiage with my name on some of these pages. I'm not sure I understand all that State Parks says, I do know I would feel more comfortable if other Indians took a stand. Non the less I appreciate the letters you and the Heritage Commission wrote on my behalf. However what I do sense is that who ever is writing the States answers really <sup>does</sup> not know the vastness of the Cultural resources with in the Anza Borrego State Parks and does not under stand the fragility of those resources. It only takes once, I think the rock art at Predras Grande showing the Padre on horseback <sup>says it all</sup> The Park has allowed capers to camp and built fires Willie Nellie for years. It only takes once, and it is gone forever. As the population continues to grow and the need to recreate continues to expand in to the desert the faster and grater the risk to the resources become, particularly when the public is allowed to continue to camp and build camp fires anywhere.

Speaking of verbiage this is more than I care to give, but its what I think, I hope that it is helpful.

As always thank you for what you do.

Sincerely,

  
CARMEN LUCAS